

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Central Illinois Light Company)	
d/b/a AmerenCILCO)	
Central Illinois Public Service)	
Company)	Docket No. 07-0539
d/b/a AmerenCIPS)	
Illinois Power Company)	
d/b/a AmerenIP)	
)	
Approval of Energy Efficiency and)	
Demand Response Plan)	
)	

**STAFF OF THE ILLINOIS COMMERCE COMMISSION PREHEARING
MEMORANDUM**

Pursuant to the request made by the Administrative Law Judge at the status hearing held on November 20, 2007, the Staff of the Illinois Commerce Commission ("Staff"), by and through its attorneys, hereby submits its Prehearing Memorandum in the above captioned matter with regard to the energy efficiency and demand response plans submitted by the Ameren Utilities ("utilities").

Staff through its testimony has addressed and or will address in its brief the following issues:

1. Address whether energy efficiency and conservation-related costs should be allocated among all ratepayers on a uniform per-kWh charge under the utilities proposed cost recovery rider mechanism.
2. Confirm that the utilities will revise their proposed rider EDR to make it clear that the incremental costs which they are seeking recovery of are only those incurred after the effect date of Section 12-103 of the Act consistent with the testimony of utilities witness Mr. Jones (Ameren Ex. 8.0 at pp. 2-3)

3. Address whether the utilities coordinated efforts with the Department of Healthcare and Family services.
4. Address whether the utilities' plan implements new building and appliance standards.
5. Address whether the utilities' plans provides opportunities for a diverse cross-section of customers of all rate classes.
6. Address whether the utilities' plans budget no more than 3% of program revenues to breakthrough equipment and devices.
7. Address whether the utilities should be allowed flexibility to modify programs as necessary to meet portfolio load reduction goals.
8. Address whether the utilities should update spending limits during the life of the plans.
9. Address whether energy efficiency and demand response measures energy savings should be annualized.
10. Address whether the utilities plans' measures are cost effective
11. Address whether the utilities' plans provide for an adequate annual independent evaluation of the plans performance.
12. Address whether the utilities proposal to use deemed values to evaluate the plans should be adopted by the Commission.
13. Address whether the Commission should approve a stakeholder process to address measurement and verification of savings for energy efficiency measures.
14. Address whether savings should be based upon actual usage or previously forecasted usage.

15. Address whether the utilities should be allowed to bank excess energy savings for the next plan year.
16. Address whether Staff should conduct workshops to solicit comments from interested stakeholders about the attributes of and appropriate procedural vehicle for developing an effective regulatory framework for a demand side portfolio as proposed by the Natural Resources Defense Council.

Respectfully submitted,

/s/ _____
JOHN C. FEELEY
CARMEN L. FOSCO
ARSHIA JAVAHERIAN
Office of General Counsel
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601
Phone: (312) 793-2877
Fax: (312) 793-1556
jfeeley@icc.illinois.gov
cfosco@icc.illinois.gov
javahera@icc.illinois.gov

January 2, 2008

*Counsel for the Staff of the
Illinois Commerce Commission*